

UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
SPARTANBURG DIVISION

JANE DOES 1-9,

Plaintiffs,

v.

COLLINS MURPHY, SHARON
HAMMONDS, BRENDA F. WATKINS,
LIMESTONE UNIVERSITY, MG
FREESITES, LTD., d/b/a PORNHUB.COM,
MG FREESITES II LTD., MINDGEEK
S.A.R.L., MINDGEEK USA, INC., MG
BILLING LTD., and HAMMY MEDIA LTD.
d/b/a XHAMSTER.COM, TRAFFICSTARS
LTD., WISEBITS LTD, XHAMSTER IP
HOLDINGS LTD, WISEBITS IP LTD

Defendants.

CASE NO. 7:20-CV-00947-JD

**DEFENDANT MINDGEEK S.A.R.L.'S
ANSWER TO FIFTH AMENDED
COMPLAINT**

Defendant MindGeek S.A.R.L. (“MG SARL” or “Defendant”), a Defendant in the above captioned matter, responds to Plaintiffs’ allegations in their Fifth Amended Complaint (ECF No. 193) as follows:

INTRODUCTION

1. Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 1 that relate to Defendant Hammy Media Ltd., and denies those allegations on that basis. Defendant denies the remaining allegations of paragraph 1.

2. Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 2, and on that basis denies each and every allegation.

3. Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 3, and on that basis denies each and every allegation.

4. Defendants admit that Plaintiffs purport to bring this lawsuit against Limestone. To

the extent that the allegations of paragraph 4 pertain to entities other than Defendant or MG Freesites Ltd, Defendant is without knowledge or information sufficient to form a basis as to the truth of the allegations, and on that basis denies each and every such allegation. Defendant denies the remaining allegations of paragraph 4.

JURISDICTION AND VENUE

5. Paragraph 5 contains legal arguments that do not require a response. To the extent a response is required, Defendant denies each and every factual allegation contained in paragraph 5. Defendant is additionally without knowledge or information sufficient to form a belief as to the truth of the allegation that this matter is between citizens of different States, and on that basis denies such allegation.

6. Paragraph 6 contains legal arguments that do not require a response. To the extent a response is required, Defendant denies each and every factual allegation contained in paragraph 6. Defendant is additionally without knowledge or information sufficient to form a belief as to the truth of the allegation that relevant events occurred in the judicial district where this action is brought, and on that basis denies such allegation.

PARTIES

7. Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 7, and on that basis denies each and every allegation.

8. Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 8, and on that basis denies each and every allegation.

9. Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 9, and on that basis denies each and every allegation.

10. Defendant is without knowledge or information sufficient to form a belief as to the

truth of the allegations in paragraph 10, and on that basis denies each and every allegation.

11. Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 11, and on that basis denies each and every allegation.

12. Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 12, and on that basis denies each and every allegation.

13. Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 13, and on that basis denies each and every allegation.

14. Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 14, and on that basis denies each and every allegation.

15. Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 15, and on that basis denies each and every allegation.

16. Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 16, and on that basis denies each and every allegation.

17. Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 17, and on that basis denies each and every allegation.

18. Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 18, and on that basis denies each and every allegation.

19. Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 19, and on that basis denies each and every allegation.

20. Defendant denies that it is jointly and severally liable to Plaintiffs for their injuries and damages. Defendant is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations in paragraph 20, and on that basis denies each and every allegation.

21. Defendant admits that MG Freesites Ltd is a Cyprus company with a registered office located at Block 1, Dali Industrial Area, 195-197 Old Road Nicosia-Limassol Dali, 2540 Cyprus. Defendant denies that Pornhub.com is a “d/b/a” of MG Freesites, Ltd. Defendant admits that MG Freesites Ltd. is its indirect subsidiary. Defendant admits that MG Freesites Ltd is the operator of the website located at www.pornhub.com (the “Pornhub Website.”) MG Freesites Ltd. is now known as AYLO Freesites, Ltd. Defendant denies the remaining allegations of Paragraph 21.

22. Defendant denies the allegations of paragraph 22. As of December 10, 2020, MG Freesites II Ltd was dissolved.

23. Defendant admits that it is a foreign holding company organized and existing under the laws of Luxembourg with its sole place of business in Luxembourg, and that its affiliates own or operate adult entertainment websites or brands. Defendant is now known as AYLO Holdings S.a.r.l. Defendant denies that its principal place of business is Montreal, Canada and the remaining allegations in paragraph 23.

24. Defendant admits that MindGeek USA Incorporated is a corporation incorporated in the state of Delaware, and is an indirect subsidiary of Defendant. Defendant denies the remaining allegations in paragraph 24.

25. Defendant admits that MG Billing Ltd. is a foreign entity incorporated in Ireland. Defendant denies the remaining allegations in paragraph 25.

26. Defendant admits that Plaintiffs refer to MindGeek S.A.R.L., MG Freesites Ltd, MG Freesites II Ltd, MindGeek USA Incorporated, MG Billing Ltd, and all of their parents, subsidiaries and affiliates as “MindGeek.” Defendant denies that such characterization is reasonable, accurate, or appropriate insofar as it includes unidentified “parents, subsidiaries and

affiliates” as among Defendants or as part of “MindGeek.” Defendants do not file this Answer on behalf of any entities other than Defendant.

27. Defendant denies each and every allegation in paragraph 27.

28. Defendant denies each and every allegation in paragraph 28.

29. Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 29, and on that basis denies each and every allegation.

30. Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 30, and on that basis denies each and every allegation.

31. Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 31, and on that basis denies each and every allegation.

32. Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 32, and on that basis denies each and every allegation.

33. Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 33, and on that basis denies each and every allegation.

34. Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 34, and on that basis denies each and every allegation.

35. Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 35, and on that basis denies each and every allegation.

BACKGROUND

36. Defendant denies that it owns or operates the website pornhub.com. Defendant is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations in paragraph 36, including because Plaintiffs do not identify the “study” at the heart of this paragraph, and on that basis denies each and every allegation.

37. Defendant admits that MindGeek S.A.R.L. is a foreign holding company organized and existing under the laws of Luxembourg and that its affiliates own or operate adult entertainment websites or brands. The New York Times article speaks for itself. Defendant denies any inconsistent or remaining allegations in paragraph 37.

38. Defendant admits that the pornhub.com website is, in part, supported by advertising. Defendant denies that it operates the Pornhub Website. Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 38, and on that basis denies each and every allegation.

39. Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 39, and on that basis denies each and every allegation.

40. Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 40, and on that basis denies each and every allegation.

41. Defendant admits that prior to December 2020, individuals with a Pornhub.com account and who agreed to the site's terms of service had the ability to upload lawful content to the Pornhub video-sharing platform, and that certain users could become "verified" users by providing a photo holding a handwritten sign to Defendant. Defendant also admits that MG Freesites Ltd has offered profit sharing programs with members of the Content Partner program and ModelHub program, but denies that such programs were available to all "verified" users or members of the public. Defendant denies that it operates the Pornhub Website. To the extent that the allegations of paragraph 41 pertain to the XHamster defendants, Defendant is without knowledge or information sufficient to form a belief as to the truth of such allegations, and on that basis denies each and every allegation

42. Defendant denies the allegations of paragraph 42 to the extent that they pertain to

Defendant. To the extent that the allegations of paragraph 42 pertain to the XHamster defendants, Defendant is without knowledge or information sufficient to form a belief as to the truth of such allegations, and on that basis denies each and every allegation.

43. Defendant admits that a hearing took place in 2021 before a committee of the Canadian Parliament and that an attorney for a plaintiff in an unrelated case purported to give testimony during that hearing. The testimony provided by such attorney speaks for itself. Defendant denies the remaining allegations of paragraph 43.

44. Defendant denies the allegations of paragraph 44 to the extent that they pertain to Defendant. To the extent that the allegations of paragraph 44 pertain to the XHamster defendants, Defendant is without knowledge or information sufficient to form a belief as to the truth of such allegations, and on that basis denies each and every allegation.

45. Defendant denies the allegations of paragraph 45 to the extent that they pertain to Defendant, and Defendant further denies that it operates the Pornhub Website. To the extent that the allegations of paragraph 45 pertain to the XHamster defendants, Defendant is without knowledge or information sufficient to form a belief as to the truth of such allegations, and on that basis denies each and every allegation.

46. Defendant admits that during the time period at issue millions videos were uploaded to the Pornhub.com website each year. Defendant denies that it operates the Pornhub Website. To the extent that the allegations of paragraph 46 pertain to the XHamster defendants, Defendant is without knowledge or information sufficient to form a belief as to the truth of such allegations, and on that basis denies each and every allegation.

47. Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 47, and on that basis denies each and every allegation.

48. Defendant admits that among the categories of videos posted to the Pornhub.com website are videos tagged as “amateur.” Defendant denies that it operates the Pornhub Website. To the extent that the allegations of paragraph 48 pertain to the XHamster defendants, Defendant is without knowledge or information sufficient to form a belief as to the truth of such allegations, and on that basis denies each and every allegation.

49. Defendant denies the allegations of paragraph 49 to the extent that they pertain to Defendant, and Defendant further denies that it operates the Pornhub Website. To the extent that the allegations of paragraph 49 pertain to the XHamster defendants, Defendant is without knowledge or information sufficient to form a belief as to the truth of such allegations, and on that basis denies each and every allegation.

50. Defendant admits that the Pornhub.com website includes content uploaded by members of the Pornhub “Content Partner” program, including content commissioned by affiliated companies; that the Modelhub program is made up of ‘verified’ users; and that Content Partners and Modelhub members share in revenue. Defendant admits that GirlsDoPorn was a Content Partner until 2019, when all content uploaded by GirlsDoPorn was removed from Pornhub.com. Defendant denies the remaining allegations of paragraph 50 to the extent they pertain to Defendant, and further denies that it operates the Pornhub Website. To the extent that the allegations of paragraph 50 pertain to the XHamster defendants, Defendant is without knowledge or information sufficient to form a belief as to the truth of such allegations, and on that basis denies each and every allegation.

51. Defendant admits that the quoted statements appeared on certain pages of the Pornhub.com website. Such statements speak for themselves. Defendant denies that it operates the Pornhub Website.

52. Defendant denies the allegations of paragraph 52 to the extent they pertain to Defendant. To the extent that the allegations of paragraph 52 pertain to the XHamster defendants, Defendant is without knowledge or information sufficient to form a belief as to the truth of such allegations, and on that basis denies each and every allegation.

53. Defendant denies the allegations of paragraph 53 to the extent they pertain to Defendant. To the extent that the allegations of paragraph 53 pertain to the XHamster defendants, Defendant is without knowledge or information sufficient to form a belief as to the truth of such allegations, and on that basis denies each and every allegation.

54. Defendant does not operate the Pornhub Website and thus is without knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 54, and on that basis denies each and every allegation.

55. Defendant admits that one of its affiliates maintains a website located at www.mindgeek.com. The MindGeek website speaks for itself. Defendant denies the remaining allegations of paragraph 55 to the extent they pertain to Defendant. To the extent that the allegations of paragraph 55 pertain to the XHamster defendants, Defendant is without knowledge or information sufficient to form a belief as to the truth of such allegations, and on that basis denies each and every allegation.

56. Defendant denies the allegations in paragraph 56 to the extent they pertain to Defendant. To the extent that the allegations of paragraph 56 pertain to the XHamster defendants, Defendant is without knowledge or information sufficient to form a belief as to the truth of such allegations, and on that basis denies each and every allegation.

57. Defendant denies the allegations of paragraph 57 to the extent that they pertain to Defendant. To the extent that the allegations of paragraph 57 pertain to the XHamster defendants,

Defendant is without knowledge or information sufficient to form a belief as to the truth of such allegations, and on that basis denies each and every allegation.

58. Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 58, and on that basis denies each and every allegation.

59. Defendant denies the allegations of paragraph 59 to the extent that they pertain to Defendant. To the extent that the allegations of paragraph 59 pertain to the XHamster defendants, Defendant is without knowledge or information sufficient to form a belief as to the truth of such allegations, and on that basis denies each and every allegation.

60. Defendant does not operate the Pornhub Website and thus is without knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 60, and on that basis denies each and every allegation.

61. Defendant denies the allegations of Paragraph 61 to the extent that they pertain to Defendant, and further denies that Defendant operates the Pornhub Website.

62. Defendant denies the allegations of paragraph 62 to the extent that they pertain to Defendant, and further denies that Defendant operates the Pornhub Website.

63. Defendant denies the allegations of paragraph 63 to the extent that they pertain to Defendant. To the extent that the allegations of paragraph 63 pertain to the XHamster defendants, Defendant is without knowledge or information sufficient to form a belief as to the truth of such allegations, and on that basis denies each and every such allegation.

64. Defendant denies the allegations of paragraph 64 to the extent that they pertain to Defendant. To the extent that the allegations of paragraph 64 pertain to the XHamster defendants, Defendant is without knowledge or information sufficient to form a belief as to the truth of such allegations, and on that basis denies each and every allegation.

65. Defendant admits that an editorial was published in the New York Times in December 2020. The editorial speaks for itself. Defendant is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations of Paragraph 65, and on that basis denies each and every allegation.

66. Defendant admits that in December 2020, MG Freesites Ltd removed certain content from the Pornhub.com website that was uploaded by users who had not been verified; implemented additional safeguards with respect to user-uploaded content; and eliminated the download button. Defendant denies the remaining allegations of Paragraph 66.

67. Defendant denies that it “archives” any content. To the extent that the allegations of paragraph 67 pertain to the XHamster defendants, Defendant is without knowledge or information sufficient to form a belief as to the truth of such allegations, and on that basis denies each and every allegation.

68. Defendant denies the allegations of paragraph 68 to the extent they pertain to Defendant. To the extent that the allegations of paragraph 68 pertain to the XHamster defendants, Defendant is without knowledge or information sufficient to form a belief as to the truth of such allegations, and on that basis denies each and every allegation.

69. Defendant denies the allegations of paragraph 69 to the extent they pertain to Defendant, including on the basis that the Complaint does not define the meaning of “pushing” uploaded content “to other sites.” To the extent that the allegations of paragraph 69 pertain to the XHamster defendants, Defendant is without knowledge or information sufficient to form a belief as to the truth of such allegations, and on that basis denies each and every allegation.

FACTS

70. Defendant re-alleges and incorporates herein by reference its response to

paragraphs 1 through 69, inclusive, of this Complaint as though fully set forth herein.

71. Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 71, and on that basis denies each and every allegation.

72. Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 72, and on that basis denies each and every allegation.

73. Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 73, and on that basis denies each and every allegation.

74. Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 74, and on that basis denies each and every allegation.

75. Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 75, and on that basis denies each and every allegation.

76. Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 76, and on that basis denies each and every allegation.

77. Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 77, and on that basis denies each and every allegation.

78. Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 78, and on that basis denies each and every allegation.

79. Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 79, and on that basis denies each and every allegation.

80. Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 80, and on that basis denies each and every allegation.

81. Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 81, and on that basis denies each and every allegation.

82. Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 82, and on that basis denies each and every allegation.

83. Defendant admits the allegations in paragraph 83.

84. Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 84, and on that basis denies each and every allegation.

85. Defendant denies the allegations of paragraph 85 to the extent they pertain to Defendant. To the extent that the allegations of paragraph 85 pertain to the XHamster defendants, Defendant is without knowledge or information sufficient to form a belief as to the truth of such allegations, and on that basis denies each and every allegation.

86. Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 86.

87. Defendant admits that the individual who used the username “Lordfauger18” was a member of the ModelHub program on the Pornhub Website. Defendant denies the remaining allegations of paragraph 87, and specifically denies Defendant operates the Pornhub Website or made any payments to “Lordfauger18.”

88. Defendant denies the allegations of paragraph 88 to the extent they pertain to Defendant. To the extent that the allegations of paragraph 88 pertain to the XHamster defendants, Defendant is without knowledge or information sufficient to form a belief as to the truth of such allegations, and on that basis denies each and every allegation.

89. Defendant denies the allegations of paragraph 89 to the extent they pertain to Defendant. To the extent that the allegations of paragraph 89 pertain to defendants other than MindGeek, Defendant is without knowledge or information sufficient to form a belief as to the truth of such allegations, and on that basis denies each and every allegation.

90. Defendant denies the allegations of paragraph 90 to the extent that they pertain to Defendant. To the extent that the allegations of paragraph 90 pertain to the XHamster defendants, Defendant is without knowledge or information sufficient to form a belief as to the truth of such allegations, and on that basis denies each and every such allegation.

91. Defendant denies the allegations of paragraph 91 to the extent they pertain to Defendant. To the extent that the allegations of paragraph 91 pertain to the XHamster defendants, Defendant is without knowledge or information sufficient to form a belief as to the truth of such allegations, and on that basis denies each and every allegation.

92. Defendant denies the allegations of paragraph 92 to the extent they pertain to Defendant. To the extent that the allegations of paragraph 92 pertain to the XHamster defendants, Defendant is without knowledge or information sufficient to form a belief as to the truth of such allegations, and on that basis denies each and every allegation.

93. Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 93, and on that basis denies each and every allegation.

94. Defendant denies the allegations of paragraph 94 to the extent they pertain to Defendant. To the extent that the allegations of paragraph 94 pertain to defendants other than Defendant or MG Freesites Ltd, Defendant is without knowledge or information sufficient to form a belief as to the truth of such allegations, and on that basis denies each and every allegation.

FIRST CAUSE OF ACTION AGAINST DEFENDANTS MURPHY, MINDGEEK and XHAMSTER

(Violation of the TVPRA, 18 U.S.C. §§ 1591, 1595)

95. Defendant re-alleges and incorporates herein by reference its response to paragraphs 1 through 94, inclusive, of this Complaint, as though fully set forth herein.

96. Defendant admits that the Trafficking Victims Protection Act was passed by

Congress in or about 2000. The remainder of this paragraph contains legal arguments that do not require a response. To the extent a response is required, Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 96, and on that basis denies each and every allegation.

97. This paragraph contains legal arguments that do not require a response. To the extent a response is required, Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 97, and on that basis denies each and every allegation.

98. This paragraph contains legal arguments that do not require a response. To the extent a response is required, Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 98, and on that basis denies each and every allegation.

99. This paragraph contains legal arguments that do not require a response. To the extent a response is required, Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 99, and on that basis denies each and every allegation.

100. This paragraph contains legal arguments that do not require a response. To the extent a response is required, Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 100, and on that basis denies each and every allegation.

101. This paragraph contains legal arguments that do not require a response. To the extent a response is required, Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 101, and on that basis denies each and every

allegation.

102. This paragraph contains legal arguments that do not require a response. To the extent a response is required, Defendant denies the allegations of paragraph 102 to the extent that they pertain to Defendant. To the extent that the allegations of paragraph 102 pertain to Murphy or the XHamster defendants, Defendant is without knowledge or information sufficient to form a belief as to the truth of such allegations, and on that basis denies each and every such allegation.

103. This paragraph contains legal arguments that do not require a response. To the extent a response is required, Defendant denies the allegations of paragraph 103 to the extent that they pertain to Defendant. To the extent that the allegations of paragraph 103 pertain to Murphy or the XHamster defendants, Defendant is without knowledge or information sufficient to form a belief as to the truth of such allegations, and on that basis denies each and every such allegation.

104. This paragraph contains legal arguments that do not require a response. To the extent a response is required, Defendant denies the allegations of paragraph 104 to the extent that they pertain to Defendant. To the extent that the allegations of paragraph 104 pertain to Murphy or the XHamster defendants, Defendant is without knowledge or information sufficient to form a belief as to the truth of such allegations, and on that basis denies each and every such allegation.

105. This paragraph contains legal arguments that do not require a response. To the extent a response is required, Defendant denies the allegations of paragraph 105 to the extent that they pertain to Defendant. To the extent that the allegations of paragraph 105 pertain to Murphy or the XHamster defendants, Defendant is without knowledge or information sufficient to form a belief as to the truth of such allegations, and on that basis denies each and every such allegation.

106. Defendant denies the allegations of paragraph 106 to the extent that they pertain to Defendant. To the extent that the allegations of paragraph 106 pertain to Murphy or the XHamster

defendants, Defendant is without knowledge or information sufficient to form a belief as to the truth of such allegations, and on that basis denies each and every such allegation.

107. Defendant denies the allegations of paragraph 107 to the extent that they pertain to Defendant. To the extent that the allegations of paragraph 107 pertain to Murphy or the XHamster defendants, Defendant is without knowledge or information sufficient to form a belief as to the truth of such allegations, and on that basis denies each and every such allegation.

108. Defendant denies the allegations of paragraph 108 to the extent that they pertain to Defendant. To the extent that the allegations of paragraph 108 pertain to Murphy or the XHamster defendants, Defendant is without knowledge or information sufficient to form a belief as to the truth of such allegations, and on that basis denies each and every such allegation.

109. This paragraph contains legal arguments that do not require a response. To the extent a response is required, Defendant denies the allegations of paragraph 109 to the extent that they pertain to Defendant. To the extent that the allegations of paragraph 109 pertain to Murphy or the XHamster defendants, Defendant is without knowledge or information sufficient to form a belief as to the truth of such allegations, and on that basis denies each and every such allegation.

110. This paragraph contains legal arguments that do not require a response. To the extent a response is required, Defendant denies the allegations of paragraph 110 to the extent that they pertain to Defendant. To the extent that the allegations of paragraph 110 pertain to Murphy or the XHamster defendants, Defendant is without knowledge or information sufficient to form a belief as to the truth of such allegations, and on that basis denies each and every such allegation.

SECOND CAUSE OF ACTION AGAINST DEFENDANTS MURPHY, MINDGEEK and
xHAMSTER
(Conducting the Affairs of an Enterprise Through a Pattern of Racketeering Activity)

111. Defendant re-alleges and incorporates herein by reference its response to

paragraphs 1 through 110, inclusive, of this Complaint, as though fully set forth herein.

THE ENTERPRISE

112. Paragraph 112 contains legal arguments that do not require a response.

113. Paragraph 113 contains legal arguments that do not require a response. To the extent a response is required, Defendant denies each and every factual allegation contained in paragraph 113.

114. Paragraph 114 contains legal arguments that do not require a response. To the extent a response is required, Defendant denies each and every factual allegation contained in paragraph 114.

115. Paragraph 115 contains legal arguments that do not require a response. To the extent a response is required, Defendant denies each and every factual allegation contained in paragraph 115.

116. Defendant denies each and every factual allegation contained in paragraph 116.

117. Defendant denies each and every factual allegation contained in paragraph 117.

118. Defendant denies each and every factual allegation contained in paragraph 118.

119. Defendant denies each and every factual allegation contained in paragraph 119.

120. Defendant denies each and every factual allegation contained in paragraph 120.

THE PATTERN OF RACKETEERING

121. Defendant denies each and every factual allegation in paragraph 121.

122. This paragraph contains legal arguments that do not require a response. To the extent a response is required, Defendant denies each and every factual allegation in paragraph 122.

123. Defendant denies each and every factual allegation in paragraph 123.

124. Defendant denies each and every factual allegation in paragraph 124.

125. Defendant denies each and every factual allegation in paragraph 125.

126. Defendant denies each and every factual allegation in paragraph 126.

127. Defendant denies each and every factual allegation in paragraph 127.

128. Defendant denies each and every factual allegation in paragraph 128.

129. Defendant denies each and every factual allegation in paragraph 129.

130. This paragraph contains legal arguments that do not require a response. To the extent a response is required, Defendant denies each and every factual allegation in paragraph 130.

131. This paragraph contains legal arguments that do not require a response. To the extent a response is required, Defendant denies each and every factual allegation in paragraph 131.

132. This paragraph contains legal arguments that do not require a response. To the extent a response is required, Defendant denies each and every factual allegation in paragraph 132.

THIRD CAUSE OF ACTION AGAINST DEFENDANT MURPHY
(Invasion of Privacy – Wrongful Intrusion upon Private Affairs)

133. Defendant re-alleges and incorporates herein by reference its response to paragraphs 1 through 132, inclusive, of this Complaint, as though fully set forth herein.

134. No response is required because Defendant is not named in Plaintiffs' Invasion of Privacy claim. To the extent a response is required, Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 134, and on that basis denies each and every allegations.

135. No response is required because Defendant is not named in Plaintiffs' Invasion of Privacy claim. To the extent a response is required, Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 135, and on that basis denies each and every allegations.

136. No response is required because Defendant is not named in Plaintiffs' Invasion of

Privacy claim. To the extent a response is required, Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 136, and on that basis denies each and every allegations.

137. No response is required because Defendant is not named in Plaintiffs' Invasion of Privacy claim. To the extent a response is required, Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 137, and on that basis denies each and every allegations.

138. No response is required because Defendant is not named in Plaintiffs' Invasion of Privacy claim. To the extent a response is required, Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 138, and on that basis denies each and every allegations.

139. No response is required because Defendant is not named in Plaintiffs' Invasion of Privacy claim. To the extent a response is required, Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 139, and on that basis denies each and every allegations.

140. No response is required because Defendant is not named in Plaintiffs' Invasion of Privacy claim. To the extent a response is required, Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 140, and on that basis denies each and every allegations.

141. No response is required because Defendant is not named in Plaintiffs' Invasion of Privacy claim. To the extent a response is required, Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 141, and on that basis denies each and every allegations.

FOURTH CAUSE OF ACTION AGAINST DEFENDANT MURPHY
(Invasion of Privacy – Wrongful Publicizing of Private Affairs)

142. Defendant re-alleges and incorporates herein by reference its response to paragraphs 1 through 141, inclusive, of this Complaint, as though fully set forth herein.

143. No response is required because Defendant is not named in Plaintiffs' Invasion of Privacy claim. To the extent a response is required, Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 143, and on that basis denies each and every allegations.

144. No response is required because Defendant is not named in Plaintiffs' Invasion of Privacy claim. To the extent a response is required, Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 144, and on that basis denies each and every allegations.

145. No response is required because Defendant is not named in Plaintiffs' Invasion of Privacy claim. To the extent a response is required, Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 145, and on that basis denies each and every allegations.

146. No response is required because Defendant is not named in Plaintiffs' Invasion of Privacy claim. To the extent a response is required, Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 146, and on that basis denies each and every allegations.

147. No response is required because Defendant is not named in Plaintiffs' Invasion of Privacy claim. To the extent a response is required, Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 147, and on that basis denies each and every allegations.

148. No response is required because Defendant is not named in Plaintiffs' Invasion of Privacy claim. To the extent a response is required, Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 148, and on that basis denies each and every allegations.

149. No response is required because Defendant is not named in Plaintiffs' Invasion of Privacy claim. To the extent a response is required, Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 149, and on that basis denies each and every allegations.

FIFTH CAUSE OF ACTION AGAINST DEFENDANT MURPHY
(Invasion of Privacy – Wrongful Appropriation of Personality)

150. Defendant re-alleges and incorporates herein by reference its response to paragraphs 1 through 149, inclusive, of this Complaint, as though fully set forth herein.

151. No response is required because Defendant is not named in Plaintiffs' Invasion of Privacy claim. To the extent a response is required, Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 151, and on that basis denies each and every allegations.

152. No response is required because Defendant is not named in Plaintiffs' Invasion of Privacy claim. To the extent a response is required, Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 152, and on that basis denies each and every allegations.

153. No response is required because Defendant is not named in Plaintiffs' Invasion of Privacy claim. To the extent a response is required, Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 153, and on that basis denies each and every allegations.

154. No response is required because Defendant is not named in Plaintiffs' Invasion of Privacy claim. To the extent a response is required, Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 154, and on that basis denies each and every allegations.

155. No response is required because Defendant is not named in Plaintiffs' Invasion of Privacy claim. To the extent a response is required, Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 155, and on that basis denies each and every allegations.

156. No response is required because Defendant is not named in Plaintiffs' Invasion of Privacy claim. To the extent a response is required, Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 156, and on that basis denies each and every allegations.

157. No response is required because Defendant is not named in Plaintiffs' Invasion of Privacy claim. To the extent a response is required, Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 157, and on that basis denies each and every allegations.

SIXTH CAUSE OF ACTION AGAINST DEFENDANT MURPHY
(Intentional Infliction of Emotional Distress)

158. Defendant re-alleges and incorporates herein by reference its response to paragraphs 1 through 157, inclusive, of this Complaint, as though fully set forth herein.

159. No response is required because Defendant is not named in Plaintiffs' Intentional Infliction of Emotional Distress claim. To the extent a response is required, Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 159, and on that basis denies each and every allegations.

160. No response is required because Defendant is not named in Plaintiffs' Intentional Infliction of Emotional Distress claim. To the extent a response is required, Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 160, and on that basis denies each and every allegations.

161. No response is required because Defendant is not named in Plaintiffs' Intentional Infliction of Emotional Distress claim. To the extent a response is required, Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 161, and on that basis denies each and every allegations.

162. No response is required because Defendant is not named in Plaintiffs' Intentional Infliction of Emotional Distress claim. To the extent a response is required, Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 162, and on that basis denies each and every allegations.

163. No response is required because Defendant is not named in Plaintiffs' Intentional Infliction of Emotional Distress claim. To the extent a response is required, Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 163, and on that basis denies each and every allegations.

164. No response is required because Defendant is not named in Plaintiffs' Intentional Infliction of Emotional Distress claim. To the extent a response is required, Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 164, and on that basis denies each and every allegations.

SEVENTH CAUSE OF ACTION AGAINST DEFENDANTS LIMESTONE and
HAMMONDS
(Negligent Hiring)

165. Defendant re-alleges and incorporates herein by reference its response to

paragraphs 1 through 164, inclusive, of this Complaint, as though fully set forth herein.

166. No response is required because Defendant is not named in Plaintiffs' Negligent Hiring claim. To the extent a response is required, Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 166, and on that basis denies each and every allegations.

167. No response is required because Defendant is not named in Plaintiffs' Negligent Hiring claim. To the extent a response is required, Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 167, and on that basis denies each and every allegations.

168. No response is required because Defendant is not named in Plaintiffs' Negligent Hiring claim. To the extent a response is required, Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 168, and on that basis denies each and every allegations.

169. No response is required because Defendant is not named in Plaintiffs' Negligent Hiring claim. To the extent a response is required, Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 169, and on that basis denies each and every allegations.

170. No response is required because Defendant is not named in Plaintiffs' Negligent Hiring claim. To the extent a response is required, Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 170, and on that basis denies each and every allegations.

171. No response is required because Defendant is not named in Plaintiffs' Negligent Hiring claim. To the extent a response is required, Defendant is without knowledge or information

sufficient to form a belief as to the truth of the allegations in paragraph 171, and on that basis denies each and every allegations.

172. No response is required because Defendant is not named in Plaintiffs' Negligent Hiring claim. To the extent a response is required, Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 172, and on that basis denies each and every allegations.

**EIGHTH CAUSE OF ACTION AGAINST DEFENDANTS LIMESTONE, HAMMONDS,
and WALKINS**
(Negligent Supervision)

173. Defendant re-alleges and incorporates herein by reference its response to paragraphs 1 through 172, inclusive, of this Complaint, as though fully set forth herein.

174. No response is required because Defendant is not named in Plaintiffs' Negligent Supervision claim. To the extent a response is required, Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 174, and on that basis denies each and every allegations.

175. No response is required because Defendant is not named in Plaintiffs' Negligent Supervision claim. To the extent a response is required, Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 175, and on that basis denies each and every allegations.

176. No response is required because Defendant is not named in Plaintiffs' Negligent Supervision claim. To the extent a response is required, Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 176, and on that basis denies each and every allegations.

177. No response is required because Defendant is not named in Plaintiffs' Negligent

Supervision claim. To the extent a response is required, Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 177, and on that basis denies each and every allegations.

178. No response is required because Defendant is not named in Plaintiffs' Negligent Supervision claim. To the extent a response is required, Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 178, and on that basis denies each and every allegations.

179. No response is required because Defendant is not named in Plaintiffs' Negligent Supervision claim. To the extent a response is required, Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 179, and on that basis denies each and every allegations.

NINTH CAUSE OF ACTION AGAINST THE DEFENDANTS MINDGEEK and
xHAMSTER
(Negligent Monitoring)

180. Defendant re-alleges and incorporates herein by reference its response to paragraphs 1 through 179, inclusive, of this Complaint, as though fully set forth herein.

181. Defendant admits that its affiliate MG Freesites Ltd. operates and maintains pornhub.com, and that the pornhub.com website contains sexually explicit material. Defendant denies that it operates pornographic websites. Defendant is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations within paragraph 181, and on that basis denies each and every such allegation.

182. Defendant denies the allegations of paragraph 182 to the extent that they pertain to Defendant. To the extent that the allegations of paragraph 182 pertain to the XHamster defendants, Defendant is without knowledge or information sufficient to form a belief as to the truth of such

allegations, and on that basis denies each and every such allegation.

183. This paragraph contains legal arguments that do not require a response. To the extent a response is required, Defendant denies the allegations of paragraph 183 to the extent that they pertain to Defendant. To the extent that the allegations of paragraph 183 pertain to the XHamster defendants, Defendant is without knowledge or information sufficient to form a belief as to the truth of such allegations, and on that basis denies each and every such allegation.

184. This paragraph contains legal arguments that do not require a response. To the extent a response is required, Defendant denies the allegations of paragraph 184 to the extent that they pertain to Defendant. To the extent that the allegations of paragraph 184 pertain to the XHamster defendants, Defendant is without knowledge or information sufficient to form a belief as to the truth of such allegations, and on that basis denies each and every such allegation.

185. This paragraph contains legal arguments that do not require a response. To the extent a response is required, Defendant denies the allegations of paragraph 185 to the extent that they pertain to Defendant. To the extent that the allegations of paragraph 185 pertain to the XHamster defendants, Defendant is without knowledge or information sufficient to form a belief as to the truth of such allegations, and on that basis denies each and every such allegation.

186. This paragraph contains legal arguments that do not require a response. To the extent a response is required, Defendant denies the allegations of paragraph 186 to the extent that they pertain to Defendant. To the extent that the allegations of paragraph 186 pertain to the XHamster defendants, Defendant is without knowledge or information sufficient to form a belief as to the truth of such allegations, and on that basis denies each and every such allegation.

TENTH CAUSE OF ACTION AGAINST THE DEFENDANTS MINDGEEK and
xHAMSTER
(False Light)

187. Defendant re-alleges and incorporates herein by reference its response to paragraphs 1 through 186, inclusive, of this Complaint, as though fully set forth herein.

188. Defendant admits that its affiliate MG Freesites Ltd. operates and maintains pornhub.com, and that the pornhub.com website contains sexually explicit material. Defendant denies that it operates or maintains pornographic websites. Defendant is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations within paragraph 181, and on that basis denies each and every such allegation.

189. Defendant admits that its affiliate MG Freesites Ltd hosts video content and that it hosted a video that is alleged to contain images of Plaintiffs. Defendant denies the remaining allegations of paragraph 189 to the extent they pertain to Defendant. To the extent that the allegations of paragraph 192 pertain to the XHamster defendants, Defendant is without knowledge or information sufficient to form a belief as to the truth of such allegations, and on that basis denies each and every such allegation.

190. Defendant denies the allegations of paragraph 190.

191. Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 191, and on that basis denies each and every allegation.

192. Defendant denies the allegations of paragraph 192 to the extent they pertain to Defendant. To the extent that the allegations of paragraph 192 pertain to the XHamster defendants, Defendant is without knowledge or information sufficient to form a belief as to the truth of such allegations, and on that basis denies each and every such allegation.

193. This paragraph contains legal arguments that do not require a response. To the

extent a response is required, Defendant denies the allegations of paragraph 193 to the extent that they pertain to Defendant. To the extent that the allegations of paragraph 193 pertain to the XHamster defendants, Defendant is without knowledge or information sufficient to form a belief as to the truth of such allegations, and on that basis denies each and every such allegation.

**ELEVENTH CAUSE OF ACTION AGAINST THE DEFENDANTS MURPHY,
MINDGEEK, and xHAMSTER
(Civil Conspiracy)**

194. Defendant re-alleges and incorporates herein by reference its response to paragraphs 1 through 193, inclusive, of this Complaint, as though fully set forth herein.

195. Defendant denies the allegations of paragraph 195.

196. Defendant denies the allegations of paragraph 196.

197. This paragraph contains legal arguments that do not require a response. To the extent a response is required, Defendant denies the allegations of paragraph 197.

PRAYER FOR RELIEF

The remainder of Plaintiffs' Fifth Amended Complaint constitutes Plaintiffs' request for relief to which no response is required. To the extent a response is required, Defendant denies that Plaintiffs are entitled to the relief sought. All allegations that have not been specifically admitted or alleged are hereby denied.

AFFIRMATIVE DEFENSES

Defendant does not presently know all of the facts and circumstances respecting Plaintiffs' claims, and reserves the right to amend this Answer. Subject to the foregoing, and without waiving or excusing Plaintiffs' burden of proof, or admitting that any of the following are in fact defenses upon which Defendant has any burden of proof as opposed to denials of matters as to which Plaintiffs have the burden of proof, or that Defendant has any burden of proof at all, Defendant hereby asserts the following affirmative defenses.

FIRST AFFIRMATIVE DEFENSE
(Failure to State a Claim)

1. The Complaint fails to state facts sufficient to constitute a claim for relief.

SECOND AFFIRMATIVE DEFENSE
(Superseding/Intervening Acts of Others)

2. Plaintiffs' claims are barred in whole or in part because the incidents alleged and all damages complained of, if any, were caused by the superseding and/or intervening acts of parties other than Defendant, and over whom Defendant has no right of control.

THIRD AFFIRMATIVE DEFENSE
(Proportionate Responsibility, Equitable Allocation, Recoupment, Set-off, and/or Comparative Fault)

3. Plaintiffs' claims are barred in whole or in part because any damage, loss, or liability alleged by Plaintiffs must be reduced, diminished, and/or barred in proportion to the wrongful or negligent conduct of persons or entities other than Defendant, including those who actually created the videos at issue and uploaded them to a number of online websites.

FOURTH AFFIRMATIVE DEFENSE
(Statutory Immunity)

4. Defendant is immune from liability for the actions as alleged by Plaintiffs pursuant to Section 230 of the Communications Decency Act, 47 U.S.C. § 230.

FIFTH AFFIRMATIVE DEFENSE
(Lack of Jurisdiction)

5. This Court lacks personal jurisdiction over Defendant.

SIXTH AFFIRMATIVE DEFENSE
(Lack of Standing)

6. Plaintiffs lack standing to assert claims against Defendant, including standing to bring claims under 18 U.S.C. § 1962(c) and 1964(c).

SEVENTH AFFIRMATIVE DEFENSE
(Statute of Limitations)

7. Plaintiffs' claims against Defendant are barred, in whole or in part, by the applicable statute of limitations.

EIGHTH AFFIRMATIVE DEFENSE
(Freedom of Speech)

8. Plaintiffs' claims against Defendant are barred, in whole or in part, by the protections of the First and Fourteenth Amendments to the United States Constitution and any freedom of speech protections afforded by the South Carolina Constitution.

NINTH AFFIRMATIVE DEFENSE
(Failure to Mitigate)

9. Plaintiffs' claims against Defendant are barred, in whole or in part, based on Plaintiffs' failure to mitigate their damages.

TENTH AFFIRMATIVE DEFENSE
(Laches, Waiver, Estoppel)

10. Plaintiff's claims against Defendant are barred, in whole or in part, by the doctrines of laches, waiver, and/or estoppel.

ELEVENTH AFFIRMATIVE DEFENSE
(Punitive Damages Limitations)

11. With respect to Plaintiffs' claims for punitive damages, Defendant specifically pleads the recover limits of S.C. Code Ann. §15-32-530 and incorporates by reference any and all standards of limitation regarding the determination and/or enforceability of punitive damage awards which arose in the decisions of *BMW of No. America v. Gore*, 116 U.S. 1589 (1996); *Cooper Industries, Inc. v. Leatherman Tool Group, Inc.*, 532 U.S. 424 (2001); *State Farm Mut. Auto Ins. Co. v. Campbell*, 538 U.S. 438 (2003), and their progeny.

TWELFTH AFFIRMATIVE DEFENSE
(Constitutional Limitations)

12. With respect to Plaintiffs' claims for punitive damages, any such damages claims are in violation of and are barred by the Constitution of the United States and any relevant

comparable state constitutional provisions, including but not limited to, the Due-Process and Equal Protection Clauses contained in the Fifth and Fourteenth Amendments; the Excessive Fines Clause of the Eighth Amendment; and the Tenth Amendment.

THIRTEENTH AFFIRMATIVE DEFENSE
(Reservation of Additional Defenses)

13. Defendant reserves the right to assert additional defenses that become apparent during discovery or otherwise.

DEFENDANT'S PRAYER FOR RELIEF

WHEREFORE, Defendant MindGeek S.A.R.L. requests relief on Plaintiffs' Complaint as follows:

1. That Plaintiffs' Complaint be dismissed with prejudice, judgment entered in favor of Defendant, and Plaintiffs take nothing by their Complaint;
2. That Defendant be awarded full costs incurred herein;
3. That Defendant be awarded reasonable attorneys' fees; and
4. That this Court award such other and further relief as it deems just and equitable.

SIGNATURE PAGE TO FOLLOW

DATED: September 14, 2023

Respectfully submitted,

TURNER, PADGET, GRAHAM AND LANEY, P.A.

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